

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE**

CHRISTIE ANDREWS

PLAINTIFF,

v.

**TRI STAR SPORTS AND
ENTERTAINMENT GROUP, INC.,**

DEFENDANT.

Case No. 3:21-cv-00526

Judge Eli J. Richardson

Magistrate Judge Jefferey S. Frensley

PLAINTIFF'S EVIDENTIARY SUBMISSION

Exhibit Number	Description
1	2014.08.20 Emergency Contact form - Redacted.pdf
2	Deposition Exhibit 18 2018.01.26 Stephens' e-mail to Kinder FYI – she is out sick again today. But she change policy so I'm sure she is happy about that!
3	Deposition Exhibit 20 2018 TriStar Handbook
4	Deposition Exhibit 08 2018.08.24 E-mails regarding Computer for WFH
5	2019.04.12 E-mail regarding Andrews Accommodation.pdf
6	Depo Exhibit 22 2019.07.26 Stephens' e-mail approving Andrews Raise REDACTED
7	Deposition Exhibit 23 2020.03.15 TriStar Medical Group WebEncounter: Andrews "Are there any precautions you want me to be taking in regards to my asthma and covid-19 besides the normal wash your hands and clean your heavy touch surfaces? The only thing I saw online was people considering not taking their meds. That can't be right, right?"

Healthcare provider: The best thing you can do is wash your hands, work from home if you are able. If you have any symptoms, you need to self-quarantine.

- 8 2020.03.16 8:58 AM TriStar WebEncounter: Andrews Thank you. And don't stop with the meds right?
- 9 2020.03.16 03:36 PM Simpson E-mail COVID19 WORK FROM HOME UPDATE
Deposition Exhibit 2
- 10 2020.03.16 04_32PM E-mails regarding working from home - Involve Taylor AND STEPHENS.pdf
- 11 2020.03.16 05_00pm Andrews E-mail regarding Work from home
Andrews Deposition 15 Doc. 40-6
- 12 2020.03.16 6:45 PM TriStar Medical Group WebEncounter:
- 13 2020.03.17 10:43 AM TriStar Medical Group WebEncounter:
- 14 2020.03.17 10_07AM Luecke E-mail
Andrews Deposition Exhibit 14
- 15 2020.03.17 03_50PM Andrews E-mail submits doctor notes to bryan luecke, simpson, heather kinder, stephens.pdf
Deposition Exhibit 27
Andrews Deposition Exhibit 16
- 16 2020.03.17 09_59AM Stephens E-mail Time Stamp - Ugh – I know. I do have to say that I know cleaning products do cause some people issues – Christy has so many.pdf
Deposition Exhibit 6
- 17 2020.03.17 11_15AMSimpson Updated List WFH.pdf
Deposition Exhibit 3
- 18 2020.03.17 11_59AM Stephens E-mail Time Stamp - Ugh – I know. I do have to say that I know cleaning products do cause some people issues – Christy has so many.pdf
Deposition Exhibit 7 – correct time stamp
- 19 2020.03.17 7:35 AMTaylor E-mail to Simpson - we can review WFH -The following employees have requested to work from home based on compromised immune.pdf Plaintiff's Deposition Deposition Exhibit 5

- 20 2020.03.18 Taylor e-mail to Luecke, Stephens and Simpson - WFH Non essential operational staff - preferential considerations - ANDREWS.pdf
- Deposition Exhibit 4
- 21 2020.03.19 Non-essentials WFH
Bryan please schedule a time with Yolanda tomorrow to call Christie and discuss her layoff. All non essential staff on WFH is being laid off tomorrow
- Deposition Exhibit 17
- 22 2020.03.19 9:21 PM TriStar Medical Group WebEncounter:
- 23 2020.03.19 Is she using Vacation time right now.pdf
- 24 2020.03.20 Simpson e-mail with TN Separation Notice stating "Lack of work" and "Quit" _Redacted.pdf
- Deposition Exhibit 28
- 25 2020.03.20 Simpson e-mail with TN Separation Notice stating "Lack of work" and pdf
- 26 2020.03.22 2:03 PM TriStar Medical Group WebEncounter:
- 27 2020.03.22 7:12 PM TriStar Medical Group WebEncounter:
- 28 2020.03.23 E-mail regarding hiring job post TSE REDACTED
- Deposition Exhibit 24
- 29 2020.03.24 1:12 AM TriStar Medical Group WebEncounter:
- 30 2020.03.24 12:31PM TriStar Medical Group WebEncounter:
- 31 2020.05.18 TriStar Team Coordinator position.pdf
- Deposition Exhibit 26
- 32 WFH List Redacted
Subject Motion to Seal
- Deposition Exhibit 01
- 33 OMITTED
- 34 2021.12 TriStar's Responses To P's First Set of Interrogatories REDACTED
- Plaintiff's Depo Exhibit 10
- 35 TriStar Rebuttal to EEOC.pdf
- Deposition Exhibit 19
- 36 2021.11 TriStar's Response to P's First Set of Requests for Admission
- Deposition Exhibit 11
- 37 TriStars Responses to P's First Set of Requests for Production

38 Deposition Exhibit 12
TriStar's Responses to P's Second Set of Requests for Admission

39 Deposition Exhibit 13
TriStar's Responses to Plaintiff's Second Set of Interrogatories.pdf

40 Deposition Exhibit 14
TriStar's Supplemental Responses to Plaintiff's First Set of Requests for
Interrogatories -Deposition Exhibit 15

41 Andrews Deposition

42 Taylor Deposition

43 Simpson Deposition

44 Stephens Deposition

45 Kinder Deposition

46 Kelly Coppage Declaration

47

48 October 10, 2019 LouTaylor.net – her clients included Florida Georgia Line that
according to

49 Pollstar.com article dated October 30, 2019 Pollstar.com finished a \$50 million tour.

50 PPP Information



Respectfully submitted,

Daniel Arciniegas
Arciniegas Law PLLC
Atrium Building
1242 Old Hillsboro Road
Franklin, TN 37068
T. 629.777.5339
F. 615.988.9113
www.AttorneyDaniel.com

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on March 4, 2022, I filed the foregoing PLAINTIFF'S EVIDENTIARY SUBMISSION via the Court's electronic filing system, which will automatically send electronic notice of such filing on the following counsel of record for Defendant:

THE SWAFFORD LAW FIRM, PLLC
Tara L. Swafford, BPR # 17577
Thomas Anthony Swafford, BPR # 17577
Elizabeth G. Hart, BPR # 30070
321 Billingsly Court, Suite 19
Franklin, Tennessee 37067
Telephone: (615) 599-8406
Facsimile: (615) 807-2355
tara@swaffordlawfirm.com
tony@swaffordlawfirm.com
betsy@swaffordlawfirm.com

*Attorneys for Tri Star Sports
and Entertainment Group, Inc.*

Respectfully submitted,



Daniel Arciniegas
Arciniegas Law PLLC
Atrium Building
1242 Old Hillsboro Road
Franklin, TN 37068
T. 629.777.5339
F. 615.988.9113
www.AttorneyDaniel.com

Attorney for Plaintiff